Exhibit 3

Case 3:23-cv-03417-VC   Document 395-4   Filed 01/15/25   Page 2 of 5

9/19/2024   Richard Kadrey, et al. v. Meta Platforms, Inc.   Todor Mihaylov, Ph.D.
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IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

_____

IN RE MATTER OF:)

RICHARD KADREY, et al.,   )

Plaintiff,   )

vs.   ) C.A. NO.:

META PLATFORMS, INC.,   ) 3:23-cv-03417-VC

Defendant.   )

_____)

** HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY **

UNDER THE PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF TODOR MIHAYLOV, Ph.D.

Palo Alto, California

Thursday, September 19, 2024

Stenographically Reported by:

HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR

Realtime Systems Administrator

California CSR License #11600

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_____

DIGITAL EVIDENCE GROUP

1730 M Street, NW, Suite 812

Washington, D.C. 20036

(202) 232-0646

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 1          THE WITNESS:  It's -- my guess.  That would

 2   be my guess.

 3      Q.   (By Ms. Poueymirou)  Okay.

 4      A.   I don't know.

 5      Q.   And so what's being removed in the

 6   copyright section?

 7      A.   I don't know.

 8      Q.   Does it look like ISBN numbers?

 9      A.   It says that it might be ISBN numbers.

10      Q.   Okay.

11           When you just jump down to the November

12   17th, 2023, and these are obviously going in maybe

13   reverse chrono, it says, "There are new" --

14           (Stenographer clarification.)

15      Q.   (By Ms. Poueymirou)  "There are few

16   improvements we can make to LibGen after the manual

17   inspection of the data sets," and you go one, two,

18   three, four, the fifth bullet point, "Remove rows

19   containing copyright in the first and last 25

20   percent of the book.  Rows containing any of these

21   words 'ISBN, copyright, copyright signal, all rights

22   reserved, and DOI.'"
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 1              What do you take that to mean?

 2              MR. WEINSTEIN:  Object to form.

 3              THE WITNESS:  So I can only interpret,

 4    like, what is written here; that it is removing

 5    codes that are containing copyright in the first or

 6    the last 20 percent -- 25 percent of the book.

 7        Q.   (By Ms. Poueymirou)  Did -- did you ever

 8    process data and remove copyright from data when you

 9    were preparing data?

10        A.   I personally, no.

11        Q.   Do you know folks that did and, if so, who?

12        A.   Yeah, so it seems that Nikolay did that if

13    he is now the author of the document.

14        Q.   Do you have any idea why Meta would want

15    copyright removed from books?

16        A.   I don't know.

17        Q.   Do you know how copyright would have been

18    removed from books?

19              MR. WEINSTEIN:  Object to form.

20              THE WITNESS:  I mean, I can guess what is

21    written here.

22        Q.   (By Ms. Poueymirou)  Yeah.
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 1            How would it be removed?  Would it be

 2    removed through a script?

 3            MR. WEINSTEIN:  Object to form.

 4            THE WITNESS:  I guess.

 5       Q.   (By Ms. Poueymirou)  Okay.

 6            If you go to the next page, and it says

 7    "Copyright and PII, rows removed inside the

 8    documents."  And then you have this image here.

 9            Is that showing us the rows that were

10    removed from the documents; is that how to read this

11    document?

12            MR. WEINSTEIN:  Object to form.

13            THE WITNESS:  I guess.

14            (Stenographer clarification.)

15            THE WITNESS:  I guess I would read it like

16    this.

17       Q.   (By Ms. Poueymirou)  Okay.

18            If you go to Page 00065258.

19       A.   Which number again?

20       Q.   0065258.

21       A.   Okay.

22       Q.   This page states, "The new mig shows
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